

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

JESSIE WANGEMAN,	)	
	)	
<i>Plaintiff,</i>	)	
	)	
-vs-	)	No. 11 CV ____
	)	
CITY OF CHICAGO and	)	<i>(jury demand)</i>
CHICAGO POLICE OFFICER	)	
J.B. KRIV,	)	
	)	
<i>Defendants.</i>	)	
	)	

**COMPLAINT**

Plaintiff, by counsel, alleges as follows:

1. This is a civil action arising under 42 U.S.C. §1983. The jurisdiction of this Court is conferred by 28 U.S.C. §1343 and 28 U.S.C. §1367.
2. Plaintiff Jessie Wangeman is a resident of the State of Indiana.
3. Defendant City of Chicago is an Illinois municipal corporation.
4. Defendants J.B. Kriv was at all times relevant acting under color of his office as a police officer of the City of Chicago, Illinois. Kriv is sued in his individual capacity.
5. Defendant Kriv arrested plaintiff in the early morning hours of October 25, 2009.

6. In the course of arresting plaintiff, defendant Kriv used excessive and unreasonable force and caused plaintiff to incur serious personal injuries, including a right orbital floor fracture.

7. After inflicting serious personal injuries on plaintiff, defendant Kriv, acting within the scope of his authority as a Chicago police officer, charged plaintiff with the offense of resisting arrest.

8. At all times relevant, defendant Kriv knew that he did not have a reasonable basis to charge plaintiff with resisting arrest; Kriv's primary motivation in causing plaintiff to be prosecuted for that offense was to conceal his use of unreasonable force.

9. Plaintiff was acquitted of resisting arrest on April 27, 2011 and files this action within one year thereafter.

10. As a result of the foregoing, plaintiff was deprived of rights secured by the Fourth Amendment to the Constitution of the United States, subjected to a malicious prosecution in violation of Illinois law, and suffered personal injuries.

11. Plaintiff hereby demands trial by jury.

WHEREFORE plaintiff requests that judgment be entered against defendants City of Chicago and Kriv in an amount in excess of two hun-

dred dollars as compensatory damages and against defendant Kriv in the amount of fifty thousand dollars as punitive damages

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